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Division of Gaming Enforcement
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STATE OF NEW JERSEY
OFFICE OF THE ATTORNEY GENERAL
DIVISION OF GAMING ENFORCEMENT
DOCKET NO. 12-0214-EL

STATE OF NEW JERSEY, DEPARTMENT)	
OF LAW AND PUBLIC SAFETY,)	
DIVISION OF GAMING ENFORCEMENT,)	
)	
Petitioner,)	Civil Action
)	
v.)	PETITION FOR
)	PLACEMENT ON
CHARLES E. McCOMBS,)	EXCLUSION LIST
)	
Respondent.)	
)	

Petitioner, State of New Jersey, Department of Law and Public Safety, Division of Gaming Enforcement ("Division"), located at 1300 Atlantic Avenue, Atlantic City, New Jersey, 08401 says:

1. Respondent, CHARLES E. McCOMBS ("McCOMBS"), is a New Jersey resident, residing at [REDACTED] Atlantic City, New Jersey 08401.

2. N.J.A.C. 13:69G-1.3(a)4 authorizes the exclusion of any person

whose presence in a licensed casino establishment would be inimical to the interest of the State of New Jersey or licensed gaming therein, including:

* * *

- iii. Persons who pose a threat to the safety of the patrons or employees of a casino licensee;
- iii. Persons with a documented history of conduct involving the undue disruption of the gaming operations of casino licensees; and
- iv. Persons subject to an order of the Superior Court of New Jersey excluding such persons from all casino hotel facilities.

3. Between February 2010 and December 2011, McCombs was arrested and charged on thirteen (13) different occasions for Defiant Trespasser in violation of *N.J.S.A. 2C:18-3b*. McCombs pled guilty to each charge, except one for which an arrest warrant was issued for his failure to appear. Each offense occurred in the City of Atlantic City on licensed casino premises and the resultant criminal matter was adjudicated or remains pending before the Atlantic City Municipal Court.

4. As part of the sentencing in at least nine (9) of the criminal matters set forth in Paragraph 3, the Atlantic City Municipal Court has entered separate Orders barring McCombs from multiple casino licensees including Bally's Hotel and Casino (Bally's), Trump Taj Mahal Hotel and Casino (Taj Mahal), Claridge Hotel and Casino (Claridge), and Tropicana Hotel and Casino (Tropicana), all for a period of two years. Specifically, McCombs received two years debarment from:

- i. Ballys entered on November 23, 2010, and on July 11, 2011;
- ii. Taj Mahal entered on May 17, 2011;
- iii. Claridge entered on May 17, 2011, and on June 2, 2011; and
- iv. Tropicana entered on October 26, 2011, on December 20, 2011, and on March 13, 2012.

5. Since the first Orders set forth in paragraph 4 as to the four Atlantic City casino facilities, McCombs was present in each facility recited therein thereby violating the terms of his debarments.

6. Based on information contained in Paragraphs 1 through 5 of this Petition, McCombs is a person whose presence in a licensed casino establishment would be inimical to the interests of the State of New Jersey or licensed gaming therein.

WHEREFORE, Petitioner demands the following relief against Respondent:


A. Judgment that Respondent, Charles E. McCombs, is a person whose presence in a licensed casino establishment would be inimical to the interest of the State of New Jersey or of licensed gaming therein, within the meaning of *N.J.A.C.13:69G-1.3(a)4*;

B. Judgment entering a final order placing Respondent, Charles E. McCombs, on the exclusion list pursuant to *N.J.S.A. 5:12-71* and *N.J.A.C.13:69G-1.3(a)4*; and

C. Judgment for such other and further relief as the Director may deem just and appropriate under the circumstances.

Respectfully submitted,

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Dated: April 17, 2012